

MAY 01 1985

M/S 532

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

C.T. Corporation System, Registered Agent for
Arco Alaska, Incorporated
240 Main Street
Suite 800
Juneau, Alaska 99811

RE: Section 114 Request for Information
Arco Alaska, Inc.
EPA File Number: 1085-04-04-114

Dear Sir:

On August 29, 31, and September 1, 1984 Chemecology Corporation performed source tests on Arco's Ruston turbine, a Cleaver Brooks heater, a Lummus heater, and a 67.5×10^6 BTU/hr Broach heater. The tests were carried out in accordance with the required methods to document compliance with PSD permit No. PSD-X82-01. Based on this data, the turbine, the Lummus, and the Brooks heaters are in compliance with relevant NO_x emission limits; however, the Broach heater did not demonstrate compliance with the NO_x PSD permit condition of $0.08 \text{ lbs}/10^6 \text{ BTU}$. The tested levels of $0.0951 \text{ lbs}/10^6 \text{ BTU}$ for the Broach heater clearly exceed the PSD permit emission limit of $0.08 \text{ lbs}/10^6 \text{ BTU}$.

While the Broach heaters tested were in violation of the NO_x emission limit, the cause of violation appears to be improper heater operation. According to the CEM monitoring plan that Arco/Sohio submitted this past year, the oxygen levels in the heaters are to be monitored and maintained between 0.5 and 3.5%. The measured oxygen level during the test was at 6.5% which is rather high and probably the reason for exceeding the NO_x emission limit. It was pointed out in your February 4, 1985 letter to Doug Lowery (Alaska Department of Environmental Conservation, ADEC), that the Broach heater was tested when it was operating in excess of its design capacity and could operate in compliance at normal design capacity. Regardless of the cause of the violation, we are requiring you to retest the heater after making the necessary adjustments to bring the excess oxygen back into proper range.

Pursuant to Section 114 of the Clean Air Act [42 USC §7414], EPA requires that you demonstrate compliance with PSD permit No. PSD-X82-01 by sampling source emissions (i.e., stack performance test) and by reporting the results to EPA. In particular, we are requesting that the following be accomplished:

1. Within twenty (20) days of your receipt of this letter, and in any event no later than ninety (90) days before startup of the Broach heater, provide to EPA a plan for the performance test:



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2

2. Within three (3) days after startup of the Broach heater conduct a performance test in accordance with EPA Method 7 and the enclosed Source Sampling Report Format to demonstrate compliance with the 0.08 lbs/10⁶ BTU NO_x emission limitation;
3. At least thirty (30) days in advance of the test date, notify EPA and ADEC of the test date and location to allow observers to be present;
4. Within thirty (30) days following the performance test, submit a written report of the test results along with filed data sheets to EPA and ADEC.

Please address all EPA correspondence to:

Raymond Nye
U.S. Environmental Protection Agency
1200 Sixth Avenue, M/S 532
Seattle, Washington 98101

Correspondence to ADEC should be addressed to:

Doug Lowery
Northern Regional Office
Alaska Department of Environmental Conservation
Pouch 1601
Fairbanks, Alaska 99707

We are also concerned about the Lummus heaters. Although the Lummus heater test demonstrated compliance with the permit limitation, we understand that the Company may be making changes to the blowers and dampers on this heater. Since these auxiliaries have an important impact on the control of air to the heater, emissions may be adversely affected. If such alterations are made, EPA requires that this unit be retested unless the Company can make a compelling case that such retest is unnecessary.

Should you have any questions please feel free to contact Raymond Nye of my staff at (206) 442-4226.

Sincerely,

bc: Sharon del Moral, EPA

Gary L. O'Neal, Director
Air & Toxics Division

Enclosure

cc: Lynn Billington, Sohio
Doug Lowery, ADEC (Anchorage)

aos:r ny:ls:5/11/85
LEN VERRELL, ADEC (Juneau)

7578X

SYMBOL	Kathy Pazera, EPA-A00					
SURNAME	NYE PAUL MORAL EPS JOHNSTON SMITH					
DATE	James A. Ives, Arco					

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aos:r. lve; LS: 5/11/85; L. J. Verrell, ADEC (Juneau)

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SYMBOL						
	Kathy Pazera, EPA-AOC					
SURNAME	NYE	DEL MORAL	JOHNSTON	SMITH		
DATE						